

The Honorable Lauren King

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

NO. 2:25-cv-00244-LK

Plaintiffs,

SUPPLEMENTAL
DECLARATION OF TIMOTHY H.
DELLIT IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION

DONALD J. TRUMP, in his official capacity as President of the United States, et al.,

**NOTE ON MOTION CALENDAR:
February 28, 2025 at 2:00 p.m.**

Defendant.

1 I, Timothy H. Dellit, declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and attest to
 3 the information set forth below through personal knowledge as well as through University of
 4 Washington (UW) personnel who have assisted me in gathering this information from our
 5 institution.

6 2. I am the CEO of UW Medicine and the Dean of the UW School of Medicine.
 7 This declaration incorporates and supplements my declaration dated February 5, 2025, submitted
 8 as Dkt. #16.

9 3. In addition to the grant defunding order received by certain researchers at the
 10 UW School of Medicine from the Health Resources and Services Administration (HRSA) at the
 11 United States Department of Health and Human Services (that was thereafter rescinded), certain
 12 researchers at the UW School of Medicine also received a similar defunding order from the
 13 Centers for Disease Control (CDC) at the United States Department of Health and Human
 14 Services. For instance, on January 31, 2025, the CDC sent a communication to all of their grant
 15 recipients advising that “[t]o implement the Executive Order entitled *Defending Women From*
 16 *Gender Ideology Extremism And Restoring Biological Truth To The Federal Government . . .*
 17 you must immediately terminate, to the maximum extent, all programs, personnel, activities, or
 18 contracts promoting or inculcating gender ideology at every level and activity . . . that are
 19 supported with funds from this award,” and that “[a]ny vestige, remnant, or re-named piece of
 20 any gender ideology programs funded by the U.S. government under this award are immediately,
 21 completely, and permanently terminated.” A copy of that communication is attached hereto as
 22 Exhibit 1. That message was later rescinded on February 11, 2025 as a result of a temporary
 23 order in other litigation. A copy of that communication is attached hereto as Exhibit 2. These
 24 abrupt and disruptive emails from different federal agencies create a climate of chaos for our
 25 researchers.

1 4. While the rulings from this Court and other courts temporarily pausing the ability
 2 of federal agencies to haphazardly impose new conditions on federal research grant recipients
 3 have provided significant relief to our researchers, additional relief is required to allow our
 4 scientists to continue their groundbreaking research without fear of sudden disruption and the
 5 imposition of new arbitrary conditions on their work. Our large team of 1,000+ researchers
 6 working on federally-funded medical research grants need additional assurances that their long-
 7 planned research projects will be stable, and they cannot suddenly be stripped of the entirety of
 8 their federal research funding simply because a small handful of physicians at UW Medicine are
 9 providing necessary medical care to patients under age 19 with gender dysphoria.

10 5. Our physicians likewise need continued protection from this Court to prevent
 11 them from being targeted for baseless criminal investigations under Executive Order 14,187 for
 12 providing necessary, evidenced-based medical care that is protected under Washington law.
 13 Without continued protection from this Court, physicians who provide gender-affirming care
 14 will once again be placed in the untenable position of having to choose between practicing
 15 medicine under the fear of potential federal criminal investigation and prosecution, or else
 16 forsake their ethical duties to their patients by withholding access to lawful and needed medical
 17 care. A continued injunction from this Court will allow our physicians to continue providing
 18 necessary medical care to transgender and gender-diverse patients under age 19 without fear of
 19 being targeted for a baseless and harassing criminal investigation or prosecution.

1 I declare under penalty of perjury under the laws of the State of Washington and the
2 United States of America that the foregoing is true and correct.

3 DATED this 18 day of February 2025 at Seattle, Washington.

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TIMOTHY H. DELLIT, MD
6 CEO, UW Medicine
7 Executive Vice President for Medical Affairs
University of Washington
Paul G. Ramsey Endowed Dean, University of
Washington School of Medicine
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